

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
CLERK'S OFFICE

THE MERCY HOSPITAL, INC.,

Plaintiff

v.

MASSACHUSETTS NURSES
ASSOCIATION,

Defendant

Civ. No. 04-30014-MAP

DEFENDANT'S CROSS-MOTION TO CONFIRM ARBITRATION AWARD

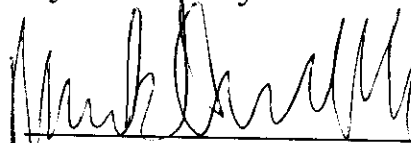
Now comes the Defendant, Massachusetts Nurses Association, and respectfully requests that the Court deny the Plaintiff's Motion to Vacate the at-issue arbitration award, and further that the Court confirm the arbitration award, granting such other and further relief as justice requires.

Respectfully submitted,

On behalf of the Defendant

Massachusetts Nurses Association

By its attorney



Mark A. Hickernell, BBO #635008
McDonald & Associates
153 Cordaville Road, Suite 210
Southborough, MA 01772
(508) 485-6600

Date: July 23, 2004

CERTIFICATE OF SERVICE

I, Mark A. Hickernell, hereby certify that I have this day by first-class mail, postage prepaid, served a copy of the foregoing Defendant's Cross-Motion To Confirm Arbitration Award upon Maurice M. Cahillane, Esq., Egan, Flanagan and Cohen, P.C., 67 Market Street, P.O. Box 9035, Springfield, Massachusetts 01102-9035.

Dated: July 23, 2004


Mark A. Hickernell